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UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;  
 ORACLE AMERICA, INC., a Delaware  
 corporation; and ORACLE INTERNATIONAL  
 CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;  
 SETH RAVIN, an individual,

Defendants.

Case No 2:10-cv-0106-LRH-PAL

**ORACLE'S MOTION TO SEAL  
 PORTIONS OF OPPOSITION TO  
 DEFENDANTS' MOTION TO  
 MODIFY THE PROTECTIVE ORDER  
 AND EXHIBITS TO ZACHARY  
 HILL'S DECLARATION**

Pursuant to the Stipulated Protective Order governing confidentiality of documents entered by the Court on May 21, 2010, Dkt. 55 (“Protective Order”), Local Rules 10-5(b) and 16.1-4, and Rules 5.2 and 26(c) of the Federal Rules of Civil Procedure, Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corporation (collectively “Oracle”) respectfully request that the Court grant leave to file under seal certain portions of Oracle’s Opposition to Defendants’ Motion to Modify the Protective Order and Exhibits A and B of the Declaration of Zachary Hill in support of the same. These portions of Oracle’s motion and supporting documents reflect information that Rimini Street, Inc. (“Rimini”) has designated “Confidential” under the Protective Order. A public, redacted version of Oracle’s Opposition to Defendants’ Motion to Modify the Protective Order and supporting declaration was filed on March 30, 2015, *see* Dkt. 544-545, and an unredacted version of each was subsequently filed under seal with the Court, *see* Dkt. 546-547.

The Protective Order states, “Counsel for any Designating Party may designate any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information – Attorneys’ Eyes Only’ under the terms of this Protective Order *only if such counsel in good faith believes that such Discovery Material contains such information and is subject to protection under Federal Rule of Civil Procedure 26(c)*. The designation by any Designating Party of any Discovery Material as ‘Confidential Information’ or ‘Highly Confidential Information – Attorneys’ Eyes Only’ shall constitute a representation that an attorney for the Designating Party reasonably believes there is a valid basis for such designation.” Protective Order ¶ 2 (emphasis supplied).

#### **DOCUMENTS DESIGNATED BY RIMINI AS CONFIDENTIAL**

Rimini has designated the following documents cited or referred to in Oracle’s opposition to defendant’s motion to modify the protective order as Confidential (“C”):

| Ex. | Description  | Designation |
|-----|--|-------------|
| A   | Excerpts from deposition of S. Ravin, taken on November 17-18, 2011                | C by Rimini |
| B   | Oracle Deposition 950, introduced during November 18, 2011 deposition of S. Ravin. | C by Rimini |

1 Oracle submits these documents under seal pursuant to the Protective Order based on  
2 Rimini's representation that it reasonably believes there is a valid basis under the Protective  
3 Order for its confidentiality designations. However, because the foregoing documents are  
4 Rimini's, Oracle is not in the position to provide further justification for why filing them publicly  
5 would cause Rimini harm sufficient to show good cause.

6 Oracle has submitted all other portions of Oracle's Opposition and supporting papers to  
7 the Court's public files, which would allow public access to all materials except for the items  
8 discussed above. Accordingly, the request to seal is narrowly tailored. For the foregoing  
9 reasons, Oracle respectfully requests that the Court grants leave to file the documents discussed  
10 above under seal.

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12 DATED: March 30, 2015

MORGAN, LEWIS & BOCKIUS LLP

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15 By: /s/ Thomas S. Hixson  
16 Thomas S. Hixson  
17 Attorneys for Plaintiffs  
18 Oracle USA, Inc.,  
19 Oracle America, Inc.,  
20 and Oracle International Corp.  
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